

STATE OF SOUTH CAROLINA

(Caption of Case)

IN THE MATTER OF COMPLAINT OF SPRINT  
COMMUNICATIONS COMPANY L.P. AGAINST  
PBT TELECOM, INC.

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

DOCKET  
NUMBER: 2008 - 389 - C

(Please type or print)

Submitted by: John J. Pringle, Jr.

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input checked="" type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

Print Form

Reset Form

John J. Pringle, Jr.  
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October 12, 2009

**FILED ELECTRONICALLY**

The Honorable Charles L.A. Terreni  
Chief Clerk

**South Carolina Public Service Commission**  
Post Office Drawer 11649  
Columbia, South Carolina 29211

RE: In the Matter of Complaint of Sprint Communications Company L.P.  
Against PBT Telecom, Inc.  
**Docket No. 2008-389-C, ELS File No. 1395-11589**

Dear Mr. Terreni:

I am writing on behalf of Sprint Communications Company, L.P. ("Sprint") to request the assistance of the Commission Staff in helping Sprint to resolve several outstanding items that are preventing Sprint from porting customers under its interconnection agreement (the "Agreement") with PBT Telecom, Inc. ("PBT"). In particular, I would ask that you or an attorney on the legal staff schedule a conference call for the purpose of discussing the issues outlined herein and establishing a firm timeline for resolving same.

As the Commission will recall, the interconnection agreement between the parties has been effective since June 1, 2008—yet Sprint has not been able to provide one day of service under that agreement.

In order to begin provisioning services under the Agreement, Sprint requires only three things from PBT, all of which have been previously requested:

- 1) Complete the Directories Questionnaire. This document determines how Sprint will process Directory Assistance and Directory Listings for its customers;
- 2) Provide the name of its Directory Listing white pages publisher and a contact name/number for same;
- 3) Provide the name of its Directory Assistance operator and a contact name/number for same; and inform Sprint whether PBT "dips" LSSi for local and national Directory Assistance.

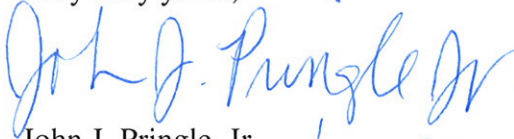
The Honorable Charles L.A. Terreni  
October 12, 2009  
Page 2

Sprint cannot begin providing service to its customers absent the provision of this information. Additionally, Sprint has requested and obtained two extensions for the use of numbering resources applicable to certain PBT rate centers from the Commission. This extension expires on October 21<sup>st</sup>, and Sprint does not want to be forced to ask for yet another extension from this Commission.

By copy of this letter, I am serving all parties of record and enclose my Certificate of Service to that effect.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

  
John J. Pringle, Jr.  
*by CR*

JJP/cr

Attachment

cc: Nannette S. Edwards, Esquire (via electronic mail service)  
William R. Atkinson, Esquire (via electronic mail service)  
All parties of record

## TRADING PARTNER PROFILE (TPP)

Porting between Sprint CLEC (SPID 8712) and **<Trading Partner> (SPID <XXXX>)**

Please return completed form to [jim.j.gampper@sprint.com](mailto:jim.j.gampper@sprint.com). Any questions may also be directed to this address. Thank you for your prompt attention.

The parties agree that information contained in the Trading Partner Profile is operational in nature and subject to change. The parties agree to make every effort to give the other party 30 days notice of any changes to its information.

### GENERAL TRADING PARTNER INFORMATION

Item	Sprint CLEC (SPID 8712)	<Trading Partner>
Company Name	Sprint Communications Company LP	
Wireless or Wireline	Wireline	
Carrier Type: ILEC, CLEC, Reseller, Wireless	CLEC	
NPAC Registered Service Provider ID (SPID)	8712	SPID = (Note: Please complete a separate TPP for each NPAC registered SPID/Port Center)

### CSR/LSR ACCEPTANCE WINDOW

Item	Sprint CLEC (SPID 8712)	<Trading Partner>
Monday – Friday	8 AM to 3 PM CST Mon – Fri. Note: Orders received after this timeframe are considered next business day.	(Include Time Zone)
As the OSP, do you process port orders with a Saturday or Sunday Due Date?	Saturday: Yes Sunday: No	Saturday: Sunday:
As the OSP, does your Port-Out Department provide support on Saturday or Sunday?	Saturday: No Sunday: No	Saturday: Sunday:
Holidays	Sprint will NOT process port orders on  New Year's Day      Labor Day Martin Luther King    Thanksgiving Day Memorial Day        Day after Thanksgiving 4 <sup>th</sup> of July              Christmas Day	What Holidays will you NOT accept and process port requests? Delete those that don't apply:  New Year's Day      4 <sup>th</sup> of July Martin Luther King Day    Labor Day Inauguration Day      Veterans Day Presidents Day        Thanksgiving Day Good Friday            Day after Thanksgiving Easter Sunday         Christmas Day Memorial Day

### INTER-CARRIER TESTING

Item	Sprint CLEC (SPID 8712)	<Trading Partner>
Have you ever ported with a competitive LEC in any of your rate centers?		
Is inter-carrier port testing required (CSR & LSR)?	No	
<b>Primary Contact Name</b>		
Contact Description	Tara Griffith	
Phone Number (Carrier Support)	816-855-6798	
FAX Number		
Email address	Tara.L.Griffith@Sprint.com	



### CARRIER INVOICE INFORMATION

Item	Sprint CLEC (SPID 8712)	<Trading Partner>
Where to send Carrier Invoices	Sprint Access Verification 6500 Sprint Parkway Overland Park, KS 66251-6108 Mailstop: KSOPHL0402	
Carrier Billing Contact	<b>Regina Roach</b> <b>Manager, Switch Access Verification</b> <b>913-315-5442</b>	

### CSR PROCESSING

Item	Sprint CLEC (SPID 8712)	<Trading Partner>
<b>CSR</b> (Customer Service Request): Do you offer a CSR product?	Yes. Sprint CLEC highly recommends that the NSP send a CSR prior to sending an LSR to reduce rejects for non-simple ports.	
<b>If yes, where do we send CSRs?</b>	<a href="mailto:port_requests@sprint.com">port_requests@sprint.com</a>	
Do you have a required CSR form? (If yes, please provide.)	Yes. Please refer to the Sprint CSR	
Media (email, fax, GUI, etc.)	Email	
Standard Response Interval	2 business days. Day (0) is submit day.	
Does the CSR identify holds or freezes?	Yes	

### LSR PROCESSING

Item	Sprint CLEC (SPID 8712)	<Trading Partner>
<b>Contact Name</b>	Port-Out Resolution Center	
Contact description		
Phone number	866-661-4585	
FAX number		
Email address		
Media accepted	Email	
<b>Where to send Residential LSRs</b>	<a href="mailto:port_requests@sprint.com">port_requests@sprint.com</a>	
<b>Where to send Commercial LSRs</b>	<a href="mailto:portrequestcommercial@sprint.com">portrequestcommercial@sprint.com</a>	
Are DSRs (Directory Service Request) sent to same location as LSRs? If no, where do we send DSRs?	Not applicable, as Sprint is a CLEC	
LSR Version ID	Most recent industry standard	
Do you have a required LSR form?	Yes. Please refer to the Sprint LSR form	If yes, please provide form
BAN Number (If used on LSR)		
Standard Interval: LSR to FOC	2 business days. Note: Day (0) is submit day. (If submitted before 3pm CST.)	
Standard Interval: LSR to Port	3 business days. Note: Day (0) is submit day (If submitted before 3pm CST.)	
<b>NPAC Concurrence:</b> As the OSP, do you send Concurrence to NPAC acknowledging the FOC DD?	Yes	
<b>Expedited LSR:</b> Do you accept Expedited LSRs?	Yes	
<b>Where to send Expedited LSRs</b>	<a href="mailto:Pout_Expedite@sprint.com">Pout_Expedite@sprint.com</a>	
Criteria/Policy:	Sprint CLEC does not accept Expedited port requests (advancing the standard DD) unless there is a service impacting situation caused by Sprint CLEC. Expedites will be considered on an a case-by-case basis with focus on preventing emergency services	

	(911, Police, Fire, Ambulance or Medical Facilities) from being out of service.  Must first notify and receive approval from the Sprint CLEC LSR Processing contact. If approval is granted to advance DDD less than the standard 3-day LSR interval, the Expedite field must be populated with a "Y"	
Charge?	Expedites are subject to a "per day" expedite rate for each day of interval improvement. Any requests that are expedited due to an OSP caused reason will not incur an expedite charge.	
<b>Order Completion</b>		
When is translations completed (TN removed from the switch) as the OSP (Old Service Provider)?	Sprint CLEC will not remove the TN from the switch until the NSP activates the TN at NPAC. Note: As the OSP (Old Service Provider), it is critical not to cancel the customer's service until late evening on the DD at the <b>earliest</b> . Sprint would prefer that OSP wait until the DD + 1, +2, or +3 to remove translations if OSP can not adhere to best practice (not remove the TN from the switch until the NSP activates the TN at NPAC).	
<b>Cancellation Procedures</b>		
As the OSP, do you accept a cancellation (Sup 1) on the due date?	Yes. For service assurance, submit Sup 1 by 3:00pm on the day before the DD. For anything received after 3:00pm on the day before the DD, contact our ACD line at 1-866-661-4585 and we will try our best to accommodate.	
Order Cancellation Contact	Submit cancel order AND Call 866-661-4585	
Cancel FOC Policy	TNs not activated at NPAC within five business days from the FOC Due Date will be canceled by Sprint CLEC (SPID 8712). Sprint CLEC will cancel the TN at NPAC and issue a cancellation notice to the NSP. If any of the canceled numbers need to be ported, a new LSR will be required by the NSP to process the request.	

Simple/Non Simple Porting - Required Validation Fields		
Item	Sprint CLEC (SPID 8712)	<Trading Partner>
Which of the four Simple port validation fields do you require? <i>(simple ports are those ports that: (1) do not involve unbundled network elements; (2) involve an account only for a single line; (3) do not include complex switch translations and (4) do not include a reseller.</i>	TN (Telephone Number) Zip (Zip Code)	Delete fields that don't apply, if any: <ul style="list-style-type: none"> <li>• TN</li> <li>• Zip</li> <li>• Account Number</li> <li>• Passcode</li> </ul>
Which of the four validation fields do you require for non-simple porting?	TN Zip	Delete fields that don't apply, if any: <ul style="list-style-type: none"> <li>• TN</li> <li>• Zip</li> <li>• Account Number</li> <li>• Passcode</li> </ul>
If you require Account Number or Passcode, do you provide via CSR?	Account Number and Passcode not required at this time	

### PORT RESOLUTION CENTER (CSR/LSR port status & reject resolution)

Item	Sprint CLEC (SPID 8712)	<Trading Partner>
Primary contact name	Port-Out Resolution Center	
Phone Number (Carrier Support)	866-661-4585	
Phone Number (Customer Support)	Cable Partner	
FAX Number	816-860-4408	
Email address		
<b>Hours of Operation:</b>		<b>Hours of Operation:</b>
Monday – Friday	8 AM to 5 PM CST M-F	
Saturday & Sunday	Closed	
Holidays	Closed	

### PORT OUT (from Sprint CLEC) ESCALATION POINT OF CONTACTS

Item	Sprint CLEC (SPID 8712)	<Trading Partner>
<b>1<sup>st</sup> Level:</b>		<b>1<sup>st</sup> Level:</b>
Primary contact name	Port-Out Resolution Center	
Phone Number (Carrier Support)	866-661-4585( 8-5 CST, M-F)	
Phone Number (Customer Support)	Cable Partner	
FAX Number	816-860-4408	
Email address		
<b>2<sup>nd</sup> Level:</b>		<b>2<sup>nd</sup> Level:</b>
Contact Name	<b>Joseph Long</b>	
Contact description	Lead Provisioner	
Phone number	816-855-4746	
FAX number	816-860-4408	
Email address	<a href="mailto:Joseph.2.Long@sprint.com">Joseph.2.Long@sprint.com</a>	
<b>3<sup>rd</sup> Level:</b>		<b>3<sup>rd</sup> Level:</b>
Contact Name	<b>Greg Godwin</b>	
Contact description	Supervisor: PO Team	
Phone number	816-855-4618	
Email address	<a href="mailto:Greg.A.Godwin@sprint.com">Greg.A.Godwin@sprint.com</a>	

### PORT IN (to Sprint CLEC) ESCALATION POINT OF CONTACTS

Item	Sprint CLEC (SPID 8712)	<Trading Partner>
<b>1<sup>st</sup> Level:</b>		<b>1<sup>st</sup> Level:</b>
Primary contact name	Sprint Provisioner that Sent LSR.	
Phone Number	Refer to LSR for Provisioner Contact Information	
<b>2<sup>nd</sup> Level:</b>		<b>2<sup>nd</sup> Level:</b>
Contact Name	Sprint EXTRA Team	
Phone number	866-352-6119 (7:00 AM – 11:00 PM CST, Mon - Sat)	

### LNP CARRIER ACCOUNT MANAGER

Carrier point-of-contact for establishing a porting relationship with Sprint CLEC (SPID 8712) as well as ongoing porting account-management. This contact information should NOT be shared with your Port Resolution Center.

Item	Sprint CLEC (SPID 8712)	<Trading Partner>
<b>Primary Contact Name</b>	Victoria Danilov	
Title	LNP Carrier Management	
Address	6330 Sprint Parkway	
City, State, Zip	Overland Park, KS 66251	
Work Phone Number	913-762-2811	



Mobile Number	913-461-6831	
Fax	913-523-9690	
E-Mail Address	<a href="mailto:victoria.a.danilov@sprint.com">victoria.a.danilov@sprint.com</a>	
<b>Alternate Contact Name</b>	Jim Gampper	
Title	LNP Carrier Management	
Address	6330 Sprint Parkway	
City, State, Zip	Overland Park, KS 66251	
Work Phone Number	913-762-3519	
Mobile Number	913-226-3172	
Fax	913-762-0117	
E-Mail Address	<a href="mailto:jim.j.gampper@sprint.com">jim.j.gampper@sprint.com</a>	
<b>Do you have a Carrier Notification distribution list for port process notifications?</b>		<b>If so, please add the LNP Carrier Account Managers listed above.</b>

### DIRECTORIES QUESTIONNAIRE: Please complete if you are an ILEC

ORDERING (DSR/LSR)	<b>Item</b>	<b>&lt;Trading Partner&gt;</b>
	<b>Who is your DIRECTORY LISTING PROVIDER (ILEC or Publisher/Vendor)?</b>	ILEC or Publisher?
	Do you publish your own directory listing?	
	Should Sprint CLEC send <b>Directory Listing</b> information to you (ILEC) or to the Publisher/Vender for new or ported TNs (LSR/EU or DSR)?	ILEC or Publisher? <ul style="list-style-type: none"> <li>▪ If publisher, Sprint CLEC will send a batch file to publisher prior to book close date.</li> <li>▪ If ILEC, Sprint CLEC will send daily DSRs.</li> </ul>
	If ILEC facilitates DL, do you accept: (A) individual DSR or LSR/EU forms or (B) do you require a Batch File prior to directory date?	DSR or Batch File?
	If ILEC facilitates DL, which do you require when <b>porting</b> : (A) LSR with DL page, or (B) separate LSR and DSR?	
	If you accept individual DSR or LSR/EU Forms to update DL, do you also update DA (Local & LD DA)?	
	Directory close date(s)?	
	<b>Directory Listing Contact Information (ILEC or Vender):</b>	
	Company Name:	
	Contact Name:	
	Contact Number	
	Contact Address	
	Contact e-mail	
	<b>Who is your DIRECTORY ASSISTANCE PROVIDER for Regional (local) and National (LD) DA?</b>	
	<b>Note:</b> Sprint CLEC provides all Sprint CLEC customers with local and LD DA. To ensure that your customers can call DA for a Sprint CLEC customer, we need to know the following information:	
	Where does ILEC send their DA records in order for ILEC customers to have Local & LD DA?	
	Who is your DA Operator Service Provider?	
	What DA database does your DA Operator Service Provider use when searching for Local and LD DA?	
	Do you maintain your own Regional DA database (411)?	Yes or No
If yes, is your Regional DA database updated from a National DA provider, such as LSSi/Volt Delta or VZB? Or, do you update a National DA provider with your DA database?		
Do you accept individual DSR or LSR/EU Forms to update DA or should Sprint CLEC send DA orders to your DA vendor?		
Do you dip a National DA provider for any DA call (local or LD)?		



AUDIT / RECONCILIATIONS	<b>Directory Assistance Contact Information (ILEC or Vender):</b>	
	Company Name:	
	Contact Name:	
	Contact Number	
	Contact Address	
	Contact e-mail	
	Who is responsible for listing the customer with the appropriate Directory Assistance Providers?	
	<b>Who is your PUBLISHER for residential (white page) listings?</b>	
	Company Name:	
	Contact Name:	
	Contact Number	
	Contact Address	
	Contact e-mail	
	<b>Who is your PUBLISHER for Commercial (yellow page) Listings?</b>	
	Company Name:	
	Contact Name:	
	Contact Number	
	Contact Address	
	Contact e-mail	
	<b>Who is your ALI owner (DB that supports 911)?</b>	
	Company Name:	
	Contact Name:	
	Contact Number	
	Contact Address	
	Contact e-mail	

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
Docket No. 2008-389-C**

IN THE MATTER OF COMPLAINT OF SPRINT  
COMMUNICATIONS COMPANY L.P. AGAINST  
PBT TELECOM, INC.

**CERTIFICATE OF SERVICE**

This is to certify that I have caused to be served this day, one (1) copy of the October 12, 2009 Letter to The Honorable Charles L.A. Terreni by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

**VIA ELECTRONIC AND FIRST-CLASS MAIL SERVICE**

Nannette S. Edwards, Esquire  
General Counsel  
Office of Regulatory Staff  
Legal Department  
PO Box 11263  
Columbia SC 29211  
[nsedwar@regstaff.sc.gov](mailto:nsedwar@regstaff.sc.gov)

**VIA ELECTRONIC AND FIRST-CLASS MAIL SERVICE**

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\_\_\_\_\_  
Carol Roof, Paralegal

October 12, 2009  
Columbia, South Carolina